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Attorneys for Defendants

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.
-----X

In re:

BERNARD L. MADOFF,

Debtor.
-----X

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities, LLC,

Plaintiff,

RICHARD M. GLANTZ, et al.

Defendants.
-----X

Adversary Proceeding
No. 08-01789-CGM

SIPA Liquidation
(Substantively Consolidated)

Adversary Proceeding
No. 10-05394-CGM

**MOTION TO WITHDRAW AS ATTORNEY OF
RECORD AND REQUEST TO BE REMOVED FROM
ELECTRONIC NOTICE AND SERVICE LISTS**

Pursuant to Local Rule 2090-1 of the Local Rules of Bankruptcy

Procedure, Richard E. Signorelli of the Law Office of Richard E. Signorelli

(“Signorelli”) hereby respectfully moves for an Order withdrawing as attorney of record for all defendants in the above-captioned adversary proceeding (Adv. Pro. No. 10-05394), including the remaining defendants named in the Second Amended Complaint (ECF Dkt. No. 93) as follows: Richard M. Glantz, individually, as trustee of the Glantz-Ostrin Trust II, as personal representative of the Estate of Edward R. Glantz, and as administrator of the Estate of Thelma Glantz; EJS Associates, L.P.; Jelris & Associates, L.P.; Grace & Company; the Estate of Edward R. Glantz; Lakeview Investment, LP; Vista Management Co.; Law & Mediation Offices of Richard M. Glantz, a Professional Corporation; Elaine Ostrin (deceased); the Estate of Thelma Glantz; and the Glantz-Ostrin Trust II (collectively, “Remaining Named Defendants”).¹

Signorelli further requests that his name be removed from all electronic

¹Pursuant to a so ordered stipulation entered on January 22, 2018, the following six defendants were dismissed prior to and in connection with the filing of the Second Amended Complaint: The Richard M. Glantz 1991 Living Trust; The Edward R. Glantz Living Trust; The Thelma Glantz Living Trust; The Glantz-Ostrin Trust I; Enhancement Group; and Merlin & Associates, Ltd. (ECF Dkt. No. 92). After the filing of the Second Amended Complaint, two additional defendants in the case – Glantz Family Foundation, Inc. and Austin Bosarge – were also dismissed from the case. Glantz Family Foundation, Inc. was dismissed pursuant to a so-ordered stipulation entered on April 12, 2019 (ECF Dkt. No. 140). Austin Bosarge was dismissed pursuant to a so-ordered stipulation entered on May 29, 2019 (ECF Dkt. No. 142).

notice and service lists in this case so that Signorelli will no longer receive any electronic notices from the Court's CM/ECF system.

In support of this motion, Signorelli respectfully states:

1. Signorelli and Bryan Ha, Esq. have been and are presently the co-attorneys of record for the Remaining Named Defendants.
2. The Remaining Named Defendants would like to be represented solely by Bryan Ha, Esq. going forward and consent to Signorelli's withdrawal as attorney of record in this case.
3. Bryan Ha, Esq. and Signorelli each consent to having Bryan Ha, Esq. serve as sole counsel for all Remaining Named Defendants.
4. As Remaining Named Defendants will continue to be represented by Bryan Ha, Esq., they will not suffer any prejudice or delay as a result of Signorelli's withdrawal as attorney.
5. Signorelli's withdrawal as attorney will not disrupt or delay this litigation, and no other party will suffer any prejudice as a result of the withdrawal.

WHEREFORE, Signorelli respectfully requests that the Court grant this motion, and order that Signorelli be withdrawn as counsel of record for all defendants in the case including the Remaining Named Defendants and that Signorelli be removed from all electronic notice and service lists in this case including under both Adv. Pro. No.

08-01789 (CGM) and Adv. Pro. No. 10-05394 (CGM) so that Signorelli will no longer
receive any electronic notices from the Court's CM/ECF system.

Dated: New York, New York
January 4, 2023

Respectfully submitted,

LAW OFFICE OF
RICHARD E. SIGNORELLI

/s/ Richard E. Signorelli

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